

# WILLKIE FARR & GALLAGHER<sub>LLP</sub>

1875 K Street, N.W.  
Washington, DC 20006-1238

Tel: 202 303 1000  
Fax: 202 303 2000

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## VIA ECF

The Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049 (LJL)**

Dear Judge Liman:

On behalf of Blake Lively, we write pursuant to Individual Rule 2(H)(2) and Rule 1 of Attachment A to Your Honor's Individual Practices in Civil Cases to respectfully request that the Court seal portions of Ms. Lively's Motion for a Protective Order ("Motion") and Exhibit A to that Motion, filed contemporaneously herewith, in an effort to protect the wellbeing and physical safety of Ms. Lively. Each redacted portion of Ms. Lively's Motion and Exhibit A reflects or is suggestive of the final proposed locations for Ms. Lively's deposition scheduled to be held on July 17, 2025. Given the highly publicized nature of this action, Ms. Lively requests that this information be sealed to protect her physical security.

The Court has previously recognized the uniquely public and media-driven nature of this case. *See* ECF No. 122 at 21:7–21, 54:20–21 ("This is a case as to which there has been a lot of public attention."); ECF No. 124 at 6 ("The details of this case have been closely followed in the media."). In addition to the traditional media, social media personalities and internet sleuths pour over the details of every public filing. Under such circumstances, the public revelation of the final location of Ms. Lively's deposition invites not only a media frenzy upon her arrival or departure (and otherwise), but also threatens to endanger Ms. Lively's physical safety notwithstanding anticipated security measures.

Any legitimate interest the public may have to the precise location and time for Ms. Lively's deposition is extremely limited. *See Stern v. Cosby*, 529 F. Supp. 2d 417, 421 (S.D.N.Y. 2007) ("[T]he presumption of public access" to a deposition transcript or videotape "is low, at best."); *Paisley Park Enters., Inc. v. Uptown Prods.*, 54 F. Supp. 2d 347, 349 (S.D.N.Y. June 29, 1999) (depositions are "not intended to be a vehicle for generating content for broadcast and other media"); *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 33 (1984) ("[P]retrial depositions . . . are not public components of a civil trial. Such proceedings were not open to the public at common law . . . and, in general, they are conducted in private as a matter of modern practice.") (citation omitted). To the contrary, there is a strong interest in ensuring that Ms. Lively's physical safety is protected. *See Sealed Plaintiff v. Sealed Defendant*, 537 F.3d 185, 190 (2d Cir. 2008) (considering the risk of "physical or mental harm" to the party when determining whether to seal the identity of a party); *Doe v. Allegheny County Hous. Auth.*,

2024 WL 379959, at \*3 n.5 (3d Cir. Feb. 1, 2024) (sealing parts of party’s filings that could “potentially jeopardiz[e] her physical safety”); *I.V.I v. Baker*, 2025 WL 1519449, at \*3 (D. Md. May 27, 2025) (sealing exhibits “[g]iven the strong interest in ensuring the physical safety of Petitioner and his family”).

Under these circumstances, any limited legitimate interest the public may have in this discovery document is heavily outweighed by the countervailing interest in protecting Ms. Lively’s physical safety. In addition, the proposed redactions are narrowly tailored to serve this purpose, consistent with the presumption in favor of public access to judicial documents. *See, e.g., Lugosh v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119–20 (2d Cir. 2006). For these reasons, Ms. Lively respectfully requests that the redacted portions of her Motion and Exhibit A be sealed until after her deposition has taken place.

Respectfully submitted,

/s/ Michael J. Gottlieb

Michael J. Gottlieb

Kristin E. Bender

Willkie Farr & Gallagher LLP

1875 K Street NW

Washington, DC 20006

(202) 303-1000

mgottlieb@willkie.com

kbender@willkie.com

Aaron E. Nathan

Willkie Farr & Gallagher LLP

787 Seventh Avenue

New York, NY 10019

(212) 728-8000

anathan@willkie.com

MANATT, PHELPS & PHILLIPS, LLP

Esra A. Hudson (*pro hac vice*)

Stephanie A. Roeser (*pro hac vice*)

Manatt, Phelps & Phillips LLP

2049 Century Park East, Suite 1700

Los Angeles, California 90067

(310) 312-4000

ehudson@manatt.com

sroeser@manatt.com

Matthew F. Bruno  
Manatt, Phelps & Phillips, LLP  
7 Times Sq  
New York, NY 10036  
(212) 790-4500  
mbruno@manatt.com

DUNN ISAACSON RHEE LLP  
Meryl C. Governski (*pro hac vice*)  
401 Ninth Street, NW  
Washington, DC 20004  
(202) 240-2900  
mgovernski@dirllp.com

*Attorneys for Blake Lively*